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October 25, 2021

VIA ECF

Hon. Tonianne J. Bongiovanni, U.S.M.J.
Clarkson S. Fisher Federal Building
and U.S. Courthouse
402 E. State Street
Trenton, New Jersey 08608

Re: *UMG Recordings, Inc. et al. v. RCN Telecom Services, LLC et al.*
Civil Action No. 19-17272 (MAS) (TJB)

Dear Judge Bongiovanni:

We represent Plaintiffs and Counterclaim-Defendant Recording Industry Association of America, Inc. (“RIAA”) in this action. We submit this letter on behalf of all parties to request a one month extension of: (1) the deadline for the submission of written discovery disputes (from October 28, 2021 to November 30, 2021), and (2) the deadline for the close of fact discovery (from January 27, 2022 to February 28, 2022).

The Court previously extended these deadlines in its orders dated June 27, 2021 and September 29, 2021. *See* ECF Nos. 163, 181. Since the most recent extension, the parties have worked diligently to address the document discovery issues they previously identified to the Court, including issues related to privilege logs, supplementing written discovery responses, and completing productions of responsive documents and data. However, a number of issues remain to be resolved. The parties are actively meeting and conferring regarding these issues, and having additional time to complete that process will likely narrow the scope of issues that require resolution by the Court. Thus, good cause exists for the requested extensions.

Further, the requested extensions will not affect any other dates in this action, as there are no deadlines set by the Court beyond the close of fact discovery.

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Accordingly, the parties respectfully request that the Court grant the requested extensions described above. We have included a proposed “So Ordered” line at the end of this letter in the hope that this proposal is acceptable to the Court.

Respectfully submitted,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

s/ Thomas R. Curtin

THOMAS R. CURTIN

cc: All counsel (via ECF and e-mail)

SO ORDERED this _____ day of October, 2021.

HON. TONIANNE J. BONGIOVANNI
United States Magistrate Judge